

**U.S. FISH AND WILDLIFE SERVICE  
ENVIRONMENTAL MANAGEMENT SYSTEM  
STATUS ASSESSMENT AND SELF-DECLARATION  
PROTOCOL**

**I. INTRODUCTION**

Department of the Interior (DOI) requirements for bureau self-declaration of Environmental Management Systems (EMS) at DOI facilities were promulgated July 7, 2004, in Office of Environmental Policy and Compliance (PEP) Environmental Compliance Memorandum No. ECM04-2 (Attachment 1). This memorandum was written in response to the Office of Federal Environmental Executive (OFEE) guidance contained in its memorandum dated January 27, 2004, Agency EMS Self-Declaration Protocol for Appropriate Facilities (Attachment 2).

Requirements contained in these memoranda include:

- An annual internal review of facility EMSs;
- An external review of facility EMSs at least once every three years;
- Training and qualifications for EMS reviewers; and
- Bureau-level self-declaration (i.e., certification) of facilities with EMSs in place and implemented.

The U.S. Fish and Wildlife Service (Service) desires to verify the completeness of Service facility EMSs to meet DOI requirements, provide information on overall Service environmental management success, assess areas for the Division of Engineering (DEN) Environmental and Facility Compliance Branch (EFC) to improve EMS implementation, and identify areas to further focus EFC and Regional Environmental Compliance Coordinator (RECC) compliance assistance efforts.

The Service has identified approximately 70 field stations that are of sufficient size and complexity to merit the development of a formal EMS. However, to varying degrees, the EMS process is being embraced at many Service facilities on a voluntary basis where informal EMSs will be sufficient.

EFC is helping these 70 field stations establish EMSs by conducting EMS Site Visits. During these Site Visits, EMS and greening awareness training and hands-on assistance for developing and implementing a documented Environmental Management Plan (EMP) are provided. An EMP is a written plan that describes the field station EMS. The EMP is based on a Service-specific template that outlines formal EMS expectations for these facilities.

The Service EMS process is not complete at the end of the EMS Site Visit; while the facility-level EMS may be in place, it is not necessarily fully implemented. Field stations are instructed to continue to refine and institute the formal EMS after the EMS Site Visit. The level of complexity and completeness of field station EMSs are expected to vary based upon their maturity and management commitment to the process. The Service field stations do not need to have a "best-in-class" EMS in order to claim that an EMS is implemented. However, minimum completeness criteria should be met.

Additional assistance beyond that provided during the EMS Site Visit may be required as field stations continue to formalize and fully implement their EMS. This support is most critical during the first year after the EMP is developed. RECCs, with the assistance of EFC, can provide this assistance.

Because Bureau-level self-declaration of facilities with EMSs in place and implemented is required by the DOI, the Service needs a protocol to assess the EMS status of its field stations. The Service EMS model is organization-specific. It is based, in principle, on EMS standards such as the International Organization for Standardization (ISO) 14001, but may not meet all specific ISO 14001 certification requirements. External certification under ISO 14001 or other EMS standards can be expensive and may have limited benefits. As a result, a Service-specific EMS status assessment and self-declaration protocol for field stations was developed.

It is recognized that Service field stations are already subject to significant reporting requirements and accountability processes on a variety of issues, such as Activity Based Costing and the Government Performance and Results Act. Therefore, the EMS assessment and self-declaration process was designed to be efficient in terms of approach and frequency so that it does not siphon off resources that could be better employed for

other environmental compliance and environmental management system implementation activities.

## II. APPROACH

The Service EMS Status Assessment and Self-Declaration Protocol are designed to meet DOI requirements in a manner that:

- Continues to foster the development and implementation of EMSs within the Service;
- Establishes a process to efficiently assess the credibility of Service field station EMSs to ensure they are being implemented, are effective, and are worthwhile; and
- Provides continued contact with Service field stations through the EMS process and associated compliance assistance efforts.

The Service EMS Status Assessment and Self-Declaration Protocol provide a tiered approach that consists of the following steps:

- **Internal EMS Review.** An annual internal EMS review by the field station as part of their EMS process;
- **External EMS Implementation Review.** A review of field station EMSs by RECCs after the first year of implementation to check on EMS status and declare (i.e., certify) that the EMSs have met Service criteria as being fully implemented; and
- **EMS Audit.** Once EMSs have been certified as "fully implemented," a periodic external audit of field station EMSs by RECCs at least once every three to five years to check on EMS status as part of the Service Environmental Compliance Audit Program for field stations.

Further details on the three parts to the Service EMS Status Assessment and Self-Declaration Protocol are provided below. A timeline identifying activities affecting the field station EMS and associated review and reporting activities is provided in Figure 1.

**A. Internal EMS Review.** Monitoring and Measurement is one of ten core elements of an EMP. The Internal EMS Review process is integrated into the field station EMS process as part of this element.

1. ***Procedure.*** At least annually, EMS management teams at each field station will internally review their EMP relative to actual programs and practices to ensure their EMS is being implemented. Management teams will assess the overall completeness of their EMPs. The management teams will also review progress towards EMP goals and targets as well as any changes in applicable laws and regulations or operations that would result in the need to update EMPs. The Service EMS Review Protocol (Attachment 3) may be used by management teams to assist in this process.
  2. ***Schedule and Frequency.*** The Internal EMS Review process will occur annually beginning the first year following the EMS Site Visit when the EMS is put in place.
  3. ***Reporting.*** All reporting of Internal EMS Review results will be retained at and distributed internally within field stations, in accordance with the field station's documented EMP communication and reporting procedures.
  4. ***Training.*** EMS training for field station personnel responsible for implementing the EMS, including how to conduct EMS Internal Reviews, is conducted by EFC during the EMS Site Visit.
- B. External EMS Implementation Reviews.** To assess the status of field station EMSs and determine if they have taken root following EMS Site Visits, the Service has established a process for conducting External EMS Implementation Reviews. The purpose of these reviews is to assess the implementation status of field station EMSs as implementation gets underway and identify when field stations have "fully implemented" certifiable EMSs. These reviews are conducted by RECCs with assistance from EFC (and contractors, if determined appropriate).
1. ***Procedure.*** The External EMS Implementation Review may be conducted remotely (e.g., via correspondence and telephone) or in-person in conjunction with a site visit for other purposes. A site visit is not required specifically for the purpose of the initial field station External EMS Implementation Review. The External EMS

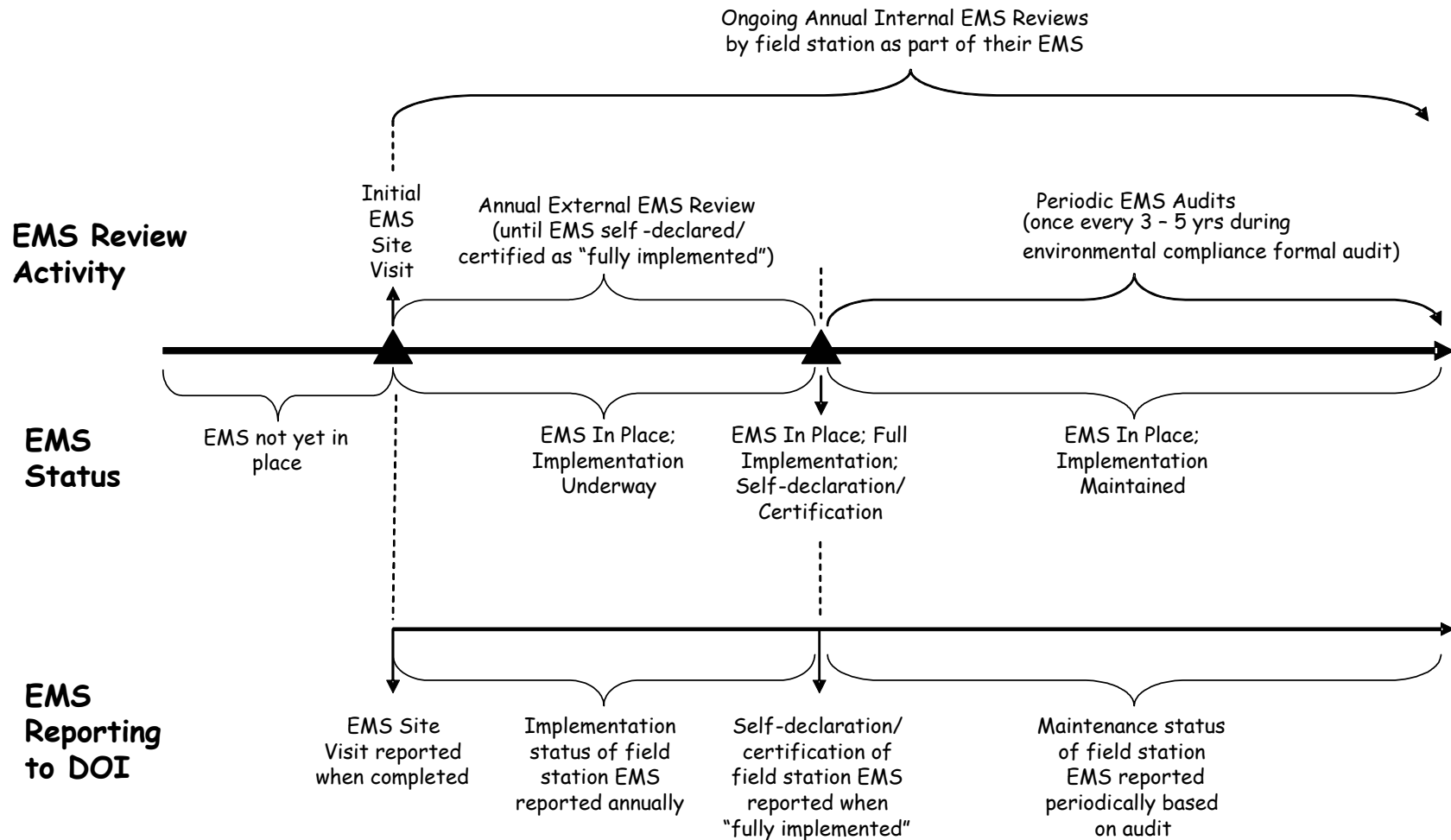
Implementation Review of a field station EMS consists of the following procedure:

- a. Assessment of the field station documented EMP. (An electronic copy of the most current EMP will be requested from the field station in advance.) The focus of this assessment is on the completeness and site-specific content of EMP documentation.
  - b. Interviews with the Field Station Manager or their designee to help determine the level of EMS implementation at the field station.
  - c. Use of the U.S. Fish and Wildlife Service EMS Review Protocol (see Attachment 3) to help determine the level of EMS implementation at the field station.
  - d. Compliance assistance in areas needing EMS improvement as a means of continually improving the field station EMP.
2. ***Schedule and Frequency.*** External EMS Implementation Reviews will begin in Calendar Year 2005. All field stations where an EMS has been implemented for at least one year (i.e., one year following the EMS Site Visit) will be reviewed during this year. Reviews will be conducted with the field station annually thereafter until it is determined by the RECC that the field station EMS is "fully implemented" based upon criteria established in the U.S. Fish and Wildlife Service EMS Review Protocol. External EMS Implementation Reviews will not continue after this determination is made.
3. ***Reporting.*** RECCs will report the results of their reviews to EFC annually. EFC will summarize and collate the field station EMS implementation status data from each of the regions in the "Service Annual Calendar Year Executive Order 13148 Report to the Department" specified in ECM04-02. Those field stations determined to have an EMS fully implemented will be self-declared (i.e., certified) as having an EMS "in place" as defined in DOI PEP - Environmental Compliance Memorandum No. ECM04-2. A certificate will be issued for self-declaration, signed by the certifying official.
4. ***Training.*** RECCs gained experience and knowledge of the Service EMS and EMP process for Service field stations through EMS training conducted in January, 2003, and participation in EMS Pilot and

Implementation Site Visits conducted between 2002 and 2004. EFC will conduct additional training on External EMS Implementation Review procedures during future RECC meetings.

- C. EMS Audits.** Once a field station EMS is "fully implemented," ongoing, periodic reviews of field station EMSs to assess how they have maintained their EMS are required by the DOI. These reviews will be carried out by RECCs during Service environmental compliance audits of field stations. This approach is designed to lessen long-term program costs, reduce disruption to field stations, and facilitate the integration of management system solutions for environmental compliance.
1. ***Procedure.*** Verification of EMS implementation will be tracked through the Service Environmental Compliance Audit Protocols. Requirements will be consistent with the External EMS Implementation Review procedures.
  2. ***Schedule and Frequency.*** Once field station EMSs are self-declared as being fully implemented, EMS audits will be conducted at the field station based on the environmental audit schedule. This will occur once every 3 to 5 years.
  3. ***Reporting.*** RECCs will report negative and positive EMS audit findings to EFC as part of the audit reporting process. EFC will track the EMS-related audit data from each of the regions and report this information, as applicable, in the "Service Annual Calendar Year Executive Order 13148 Report to the Department" specified in ECM04-02.
  4. ***Training.*** EMS auditing procedures will be incorporated into Service Environmental Auditor Training, which is required for RECCs once every two years.

**Figure 1**  
**EMS Status Assessment and Self Declaration**  
**Timeline for Field Stations**







### ATTACHMENT 3

#### U.S. FISH AND WILDLIFE SERVICE ENVIRONMENTAL MANAGEMENT SYSTEM REVIEW PROTOCOL

The U.S. Fish and Wildlife Service EMS Review is an assessment of the field station EMS to determine the implementation status of the field station EMS. The EMS review process is subjective but utilizes performance criteria that result in an overall EMS ranking.

Individual EMS elements are ranked based on the completeness criteria provided in the Service EMP Element Review Criteria Table (Table 1):

- EMS Element In Place; Implementation Starting (Score 1);
- EMS Element In Place; Partial Implementation (Score 2);
- EMS Element In Place; Full Implementation (Score 3).

The Service has determined that certain EMS elements are more critical to overall EMS implementation than others. Each EMS element is ranked in importance on a scale of 1 to 5 to reflect this reality. An overall field station EMS status is then determined by calculating a total field station score using the weighted values for each EMP element. The results of the review provide an overall EMS score (see Table 2) that equates to the field station EMS status determination in one of the four following categories:

- EMS Not Yet Begun (EMS Site Visit not yet completed; documented EMP/EMP elements not prepared) (Score 0);
- EMS In Place, Implementation Starting (Score 33 - 50);
- EMS In Place, Partial Implementation (Score 51 - 77);
- EMS In Place; Full Implementation (Score 78 - 99).

For External EMS Implementation Reviews and EMS Audits, independent, environmental professionals trained by the Division of Engineering, Environmental and Facility Compliance Branch (EFC) will be used to conduct the reviews to ensure quality and consistency on a Service-wide basis. These will include Regional Environmental Compliance Coordinators (RECCs) or others.

## PROCEDURE:

1. Obtain a current copy of field station EMP.
2. Review the field station EMP.
3. Conduct interviews (phone or in-person) with the Field Station Manager or their designee to determine the field station's degree of EMS implementation, including but not limited to performance against EMP goals and targets.
4. Based on information collected, complete the EMP element by element assessment using the Service EMP Element Review Criteria (Table 1).
5. Prepare weighted scores for each EMP Element using the ranking factors provided in the EMP Element Review Criteria (Table 1).
6. Calculate the total EMS review score. Determine the overall ranking for the field station EMP based on the criteria outlined in the Field Station EMS Score (Table 2).

A Field Station EMS Status Record is provided for use in recording EMS information and calculating the EMS score for each field station following Tables 1 and 2.

Table 1  
U.S. Fish and Wildlife Service EMP Element Review Criteria

EMP Element	Rank	Score	Completeness Criteria
1. Environmental Policy - Documenting and communicating senior management approval and support of the EMS.	1	1	Field station-specific policy prepared and signed but not posted.
		2	Field station-specific policy prepared and signed and posted but not communicated to field station personnel.
		3	Field station specific policy prepared, signed, posted, communicated, and reviewed and updated as necessary.
2. Inventory of Environmental Aspects and Impacts - Identifying and ranking field station activities, products and services that impact the environment.	4	1	Field station inventory of environmental aspects has not been reviewed or updated since the EMS Site Visit.
		2	Field station aspects and impacts have been identified and are updated but have not been used to help direct field station activities.
		3	Field Station has developed and updated its environmental aspects and impacts and uses this information when directing field station environmental activities.
3. Goals and Targets - Setting environmental goals to achieve improved environmental performance relative to field station aspects and impacts and defining measurable targets that will contribute to meeting these goals.	5	1	Annual field station environmental goals and targets have not been reviewed or updated since the EMS Site Visit.
		2	Annual field station goals and targets have been reviewed and updated but targets are not measurable, are not appropriate in number or scope given the size and complexity of the field station or are not tied to high ranking field station aspect and impacts.
		3	Annual field station goals and targets are developed, are measurable, appropriate in number and scope and are being used to direct activities.

Table 1  
U.S. Fish and Wildlife Service EMP Element Review Criteria  
(Cont.)

EMP Element	Rank	Score	Completeness Criteria
4. Roles and Responsibilities - Defining key environmental responsibilities and establishing accountability for these responsibilities.	4	1	Environmental management responsibilities for key field station personnel have not been reviewed or updated since the EMS Site Visit.
		2	Documented environmental management responsibilities for key field station personnel have been reviewed and updated but responsibilities have not been fully communicated to affected personnel and/or performance in these areas is not formally accounted for in annual performance reviews.
		3	Environmental management responsibilities for key field station personnel have been documented reviewed and are up-to-date and performance in these areas is formally accounted for in annual performance reviews.
5. Documentation Control and Information Management - Identifying and maintaining environmental documentation including EMP, environmental plans, standard operating procedures, reports, electronic data such as local area network files and internet information sources and other information.	3	1	Environmental management documents, electronic files and information sources have not been identified or cataloged beyond that completed during the EMS site visit; SOPs have not been reviewed, updated, distributed or implemented.
		2	SOPs have been reviewed, updated, distributed and implemented; inventories for environmental management documents, electronic files and other information sources exist but are not up-to-date and/or procedures established to manage distribution of these materials are not used.
		3	SOPs have been reviewed, updated, distributed and implemented; inventories for environmental management documents, electronic files and other information sources exist and are up-to-date and procedures established to manage distribution of these materials are used.

Table 1  
U.S. Fish and Wildlife Service EMP Element Review Criteria  
(Cont.)

EMP Element	Rank	Score	Completeness Criteria
6. Reporting - Identifying environmental reporting requirements and ensuring these reports are completed.	3	1	Environmental reporting requirements for the field station have not been reviewed or updated since the EMS Site Visit; reporting responsibilities have not been well defined and/or reports are not consistently completed in a timely manner.
		2	The inventory of environmental reporting requirements for the field station have been reviewed and updated since the EMS Site Visit but is still not current and/or reporting responsibilities have not been well defined and/or reports are not consistently completed in a timely manner.
		3	The inventory of environmental reporting requirements for the field station is current, reporting responsibilities have not been defined and reports are being submitted in a timely manner.
7. Training - Identifying environmental training requirements and ensuring this training is completed.	4	1	Environmental training requirements for field station personnel have not been reviewed or updated since the EMS Site Visit; and/or environmental training records are not maintained and/or key environmental training has not been conducted.
		2	Environmental training requirements for field station personnel are up-to-date but environmental training records are incomplete and/or some key personnel do not have up-to-date training.
		3	Environmental training requirements for field station personnel are defined and are up-to-date; environmental training records are maintained and training is largely up-to-date.

Table 1  
U.S. Fish and Wildlife Service EMP Element Review Criteria  
(Cont.)

EMP Element	Rank	Score	Completeness Criteria
8. Communication - Determining environmental communication methods and ensuring these communications are occurring.	2	1	Field station-specific environmental communication methods, roles and responsibilities have not been reviewed or updated since the EMS Site Visit.
		2	Environmental communication methods have been defined and are up-to-date but procedures have not been institutionalized.
		3	Communication methods have been defined, are up-to-date and are being consistently employed.
9. Budget - Understanding environmental funding sources and accounting for environmental costs in field station budget decisions.	3	1	Environmental funding sources are not identified and/or understood; environmental costs are not accounted for in field station budgets.
		2	Environmental funding sources are identified and understood; environmental costs are not separately accounted for in field station budgets.
		3	Environmental funding sources are identified and understood; environmental costs are accounted for in field station budgets.
10. Monitoring and Measurement - Operational, environmental performance assessment, management system evaluations.	4	1	The field station has not reviewed and updated as necessary, documented internal monitoring that should be conducted since the EMS Site Visit; the field station has not conducted internal compliance or EMP reviews.
		2	The field station has reviewed and updated documented internal monitoring processes; internal compliance and/or EMP reviews and EMP goal and target reviews have not been fully implemented.
		3	The field station has up-to-date documented monitoring and measurement processes including internal compliance and/or EMP reviews and EMP goal and target reviews; the field station has implemented these monitoring processes.

Table 2  
U.S. Fish and Wildlife Service Field Station EMS Score

Total Weighted EMS Review Score	Status
0	EMS Not Yet Begun (EMS Site Visit not yet completed; documented EMP/EMP elements not prepared)
33 - 50	EMS In Place; Implementation Starting
51 - 77	EMS In Place; Partial Implementation
78 - 99	EMS In Place; Full Implementation/Certification

## FIELD STATION ENVIRONMENTAL MANAGEMENT SYSTEM STATUS RECORD

Field Station: \_\_\_\_\_

Date: \_\_\_\_\_

Reviewer: \_\_\_\_\_

EMP Element	Rank	Score (1 to 3) <sup>1</sup>	Weighted Score (Rank x Score)
1. Environmental Policy	1		
2. Inventory of Environmental Aspects and Impacts	4		
3. Goals and Targets	5		
4. Roles and Responsibilities	4		
5. Documentation Control and Information Management	3		
6. Reporting	3		
7. Training	4		
8. Communication	2		
9. Budget	3		
10. Monitoring and Measurement	4		
EMS Status Score (Sum of Weighted Scores for Each EMP Element) <sup>2</sup>			

1. See U.S. Fish and Wildlife Service Environmental Management System Review Protocol Table 1 for Completeness Criteria.
2. EMS Status Score (from U.S. Fish and Wildlife Service Environmental Management System Review Protocol Table 2):
 

0	EMS Not Yet Begun
33 - 50	EMS In Place; Implementation Starting
51 - 77	EMS In Place; Partial Implementation
78 - 99	EMS In Place; Full Implementation/Certifiable